

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

JEFFERY ALONZO SIMMS)	
)	
)	
Plaintiff)	C.A. No. 04-1205-SLR
)	
v.)	
)	
M.D. HARRY M. FREEMAN, ET AL)	JURY OF 12 DEMANDED
)	
Defendants.)	

**REQUEST FOR PRODUCTION DIRECTED TO PLAINTIFF
BY DEFENDANT ROBERTA F. BURNS, M.D.**

The defendant requests the plaintiff to produce for examination and copying at the office of the attorney for defendant on or before thirty (30) days from receipt of this Request:

1. All documents referred to in Plaintiff's Answers to Interrogatories filed simultaneously hereto.
2. Copies of all documents which are relevant, in whole or in part, to plaintiff's claims for medical malpractice, Eighth Amendment violations and deliberate indifference.
3. Copies of all documents which are relevant, in whole or in part, to plaintiff's claims of special and general damages (including future lost wages claimed).
4. Please produce your Federal and State income tax returns for the years 1996 through the present.
5. Copies of all bills and receipts evidencing payment of bills for which the plaintiffs seek compensation in this lawsuit.
6. Copies of the curriculum vitae and reports of all experts you intend to call at trial.

MCCULLOUGH & MCKENTY, P.A.

/s/ Dana Spring Monzo

Daniel L. McKenty, Del. Bar No. 2689

Dana Spring Monzo, Del Bar No. 4605

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Attorneys for Defendant Roberta F. Burns M.D.

June 8, 2006

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DISTRICT OF DELAWARE**

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Defendants.)	

CERTIFICATE OF SERVICE

I certify that, on this date, one copy of the attached *Request for Production Directed to Plaintiff by Defendant Roberta F. Burns, M.D.* was served, electronically (and one copy by mail), on the following individuals:

Jeffrey M. Austin, Esquire
Elzufon Austin Reardon Tarlov & Mondell, P.A.
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Ralph K. Durstein, III, Esquire
Department of Justice
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Wilmington, DE 19801

Jeffery Alonzo Simms
SBI # 198625
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1181 Paddock Road
Smyrna, DE 19977

/s/ Dana Spring Monzo
Dana Spring Monzo, Del Bar No. 4605

June 8, 2006